

DECLARATION OF CAROLEEN AH HEE

I, Caroleen Ah Hee, hereby solemnly declare under the penalty of perjury the following:

1. I am a 47 year old female. I am not disabled. I am an employee of Defense Reutililization and Marketing Service - Hawaii ("DRMS"). I previously worked at Defense Reutililization and Marketing Office - Hawaii ("DRMO") from June 1992 until June 2001. Mrs. Linda Sekiya was a co-worker of mine at DRMO.
2. During my employment at DRMO, I worked in the Administrative Branch, directly under the supervision of Mr. Edwin Domdoma.
3. Mr. Domdoma would have "favorites" within the Administrative Branch. Mr. Domdoma favored the employees that he felt he could have the most control over. I was, however, not among his favored employees.
4. Mr. Domdoma often intimidated and berated many of the DRMO employees. Mr. Domdoma created such a harsh and uncomfortable work environment, that I would often become stressed and fearful at my job.
5. Over the last two years under Mr. Domdoma, the work environment became especially unbearable. On 7/11/2000, I almost suffered a heart attack and was rushed to the emergency room at Saint Francis West Hospital- my blood pressure had sky-rocketed and I had cold sweats and numbness in both hands - I stayed home for a week and that incident was a wake-up call for me to start looking for a new job.
6. Mrs. Sekiya told me, on one particular occasion, that Mr. Domdoma said he didn't "like it when women stand up" to him.
7. Mr. Godfrey Ching, Mrs. Sekiya's supervisor, would make degrading comments about Mrs. Sekiya's foot disability. I recall Mr. Ching would say, on more than one occasion to Mrs. Sekiya, to "cut it off already." Mr. Ching would often say "off the wall" comments and I did not think it was appropriate for him to do so, since he was a supervisor.
8. Although I work for DRMS, away from the direct supervision of Mr. Domdoma, I am still fearful that he will retaliate against me if he finds out about my participation in any complaints against him.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on August 1, 2003.

Caroleen Ah Hee
CAROLEEN AH HEE

EXHIBIT

000390